

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER DISASTER  
SITE LITIGATION

**21 MC100 (AKH)**

IN RE LOWER MANHATTAN DISASTER  
SITE LITIGATION

**21MC102 (AKH)**

IN RE COMBINED WORLD TRADE  
CENTER AND LOWER MANHATTAN  
DISASTER SITE LITIGATION

**21MC103 (AKH)**

**NOTICE OF MOTION FOR RELIEF: Dismissal of all claims and other related relief**

**PLEASE TAKE NOTICE** that on a date to be determined by this Court, Plaintiffs as shall apply to the Honorable Alvin K. Hellerstein, United States District Judge, at the Southern District of New York located at 500 Pearl Street, New York, New York, Room 14-D for an Order seeking dismissals of all the claims against all defendants on all cases listed on Exhibit “A” annexed to the Declaration, pursuant to Federal Rule of Civil Procedure, Rule 41 (a) (2) and to have the Clerk of the Court so designate these cases as “dismissed” on the ECF system in their individual dockets. This dismissal is sought with prejudice and without costs. Further, an Order of the Court is sought with reference to those cases listed on Exhibit “B,” (these cases already subject to a presumptive Order of Dismissal), annexed to the Declaration, pursuant to Federal Rule of Civil Procedure, Rule 41 (a) (2) and/or as otherwise the Court may direct, to formally dismiss these cases with prejudice and without costs, said cases having been presumptively dismissed pursuant to the following Orders: Order of the Court, “General Order Sua Sponte Dismissing Complaints” dated October 14, 2010 (Exhibit C); Endorsed Letter/Order of the Court, Patton Boggs, LLP, dated November 10, 2010 (Exhibit D); Endorsed Letter/Order

of the Court, Richard J. Katz, Esq., dated November 15, 2010 (Exhibit E); Endorsed Letter/Order of the Court, Worby Groner Edelman & Napoli Bern LLP, December 15, 2010 (Exhibit F); and Endorsed Letter/Order of the Court, Worby Groner Edelman & Napoli Bern LLP, January 20, 2011 (Exhibit G); and to have the Clerk so designate these cases as “dismissed” on the ECF system in their individual dockets.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, moving Plaintiff relies upon the attached Declaration of Robert A. Grochow and supporting Exhibits.

Dated: New York, New York  
March 2, 2012

Gregory J. Cannata and Associates

By:   
Robert Grochow (RG1890)

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TO:  
All Counsel and Defendants  
Notice provided by ECF filing of this Motion